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4 **STATE OF OREGON**  
5 **DEPARTMENT OF CONSUMER AND BUSINESS SERVICES**  
6 **DIVISION OF FINANCIAL REGULATION**

7 In the Matter of:

Case No. CA-24-0049

8 Man Data, Inc. d/b/a Pacific Coast Credit

**FINAL ORDER TO CEASE AND  
DESIST AND FINAL ORDER  
ASSESSING CIVIL PENALTIES,  
ENTERED BY CONSENT**

9 Respondent.

10 The Division of Financial Regulation (“Division”) acting on behalf of the  
11 Director of the Department of Consumer and Business Services for the State of Oregon  
12 (the “Director”) investigated the business activities of Man Data, Inc. d/b/a Pacific Coast  
13 Credit (“Man Data”) and determined that Man Data violated certain provisions of Oregon  
14 Revised Statutes (“ORS”) 697.005 to 697.095 and Oregon Administrative Rules  
15 (“OAR”) 441-810-0000 through 441-810-0260 (collectively the “Oregon Collection  
16 Agency Law”).

17 Man Data wishes to resolve and settle this matter with the Director.

18 Now, therefore, as evidenced by the authorized signatures subscribed on this  
19 Order, Man Data hereby CONSENTS to entry of this Order upon the Director’s Findings  
20 of Fact and Conclusions of Law as stated hereinafter.

21 **FINDINGS OF FACT**

22 The Director FINDS that:

- 23 1. Man Data, Inc. is an Oregon corporation with a principal place of business  
24 located at 1730 Willow Creek Circle Ste 200, Eugene, OR 97402.  
25 2. Man Data obtained an Oregon collections agency registration on about July  
26 1981 and continued to be registered as a collections agency until December 31, 2020.

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1           3. Man Data did not renew its Oregon collections agency registration for 2021  
2 before the deadline to renew; as a result, Man Data’s Oregon collections agency  
3 registration expired on December 31, 2020.

4           4. Even though Man Data’s collection agency registration expired and was not  
5 renewed, Man Data continued doing business as a collections agency in Oregon.

6           5. On or about March 9, 2022, the Division was contacted by a reporter who  
7 requested information concerning Man Data’s collections agency registration status and  
8 informed the Division that Man Data had filed hundreds of lawsuits against debtors  
9 during the previous year. Following receipt of this information, the Division opened an  
10 investigation into Man Data’s collections activity.

11           6. On or about April 6, 2022, Man Data submitted a new application to register as  
12 an Oregon collection agency into NMLS.<sup>1</sup>

13           7. On April 26, 2022, a class action lawsuit<sup>2</sup> was filed in Multnomah County that  
14 sought equitable relief for the plaintiff and sought certification for a class of Oregonians  
15 who may have been injured when Man Data collected or attempted to collect debts from  
16 them without being registered as a collection agency.

17           8. After the class action was filed, Man Data updated its NMLS record to disclose  
18 the lawsuit and, following the Division’s review of the revised application, Man Data  
19 obtained an approved Oregon collection agency registration on June 2, 2022.

20           9. While the class action litigation was active, the Division paused its  
21 investigation into Man Data’s unregistered collection activity. On March 5, 2024, almost  
22 two years after the class action lawsuit was filed, a general judgment<sup>3</sup> was entered against  
23 Man Data, closing that lawsuit.

24  
25 <sup>1</sup> Nationwide Multistate Licensing System

26 <sup>2</sup> *Juli Heath v. Man Data, Inc. d/b/a Pacific Coast Credit*, Mult Co. Case No. 22CV13893

<sup>3</sup> The judgment only adjudicated Juli Heath’s claim as the court previously denied class certification for the group of Oregonians affected by Man Data’s unregistered collection activity.

1 10. After the class action lawsuit concluded, the Division reopened its  
2 investigation into Man Data’s unregistered collection activity. The Division’s  
3 investigation revealed that, for the time period in which Man Data did not have an  
4 Oregon collections agency registration (January 1, 2021, through May 31, 2022), Man  
5 Data collected approximately \$1,643,717.94 from 3,072 Oregon consumers on claims  
6 owed, or claimed to be owed, to third-party creditors.

7 **CONCLUSIONS OF LAW**

8 The Director CONCLUDES that:

9 11. ORS 697.015 forbids a person from doing business as a collections agency in  
10 Oregon unless that person “registers with the Department of Consumer and Business  
11 Services under ORS 697.031 and maintains the registration in accordance with that  
12 section.”

13 12. Under ORS 697.005(1)(a)(A), “collection agency” means, among other things,  
14 a “person that engages directly or indirectly in soliciting a claim for collection, or  
15 collecting or attempting to collect a claim that is owed, due or asserted to be owed or due  
16 to another person or to a public body at the time the person solicits, collects or attempts to  
17 collect the claim.”

18 13. By doing business as a collections agency in Oregon without maintaining a  
19 registration as described in paragraph 10, Man Data committed 3,072 violations of ORS  
20 697.015.

21 14. Under ORS 697.095, “a person who violates any provision of ORS 697.015 or  
22 697.058... is subject to forfeiture and payment of a civil penalty to the Department of  
23 Consumer and Business Services in an amount of not more than \$1,000 for each offense.”  
24 OAR 441-810-0140 additionally provides that “civil penalties shall be \$400 for the first  
25 offense” and “\$1,000 for each subsequent offense.”

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1 15. Because the Director has reason to believe that Man Data violated ORS  
2 697.015, the Director is authorized under ORS 697.093(1)(d)(A) to order the company to  
3 cease and desist from violating this statute.

4 **ORDERS**

5 Now therefore, the Director issues the following ORDERS:

6 **Order to Cease and Desist**

7 16. As authorized by ORS 697.093(1)(d)(A), the Director ORDERS Man Data to  
8 CEASE AND DESIST from violating ORS 697.015.

9 **Order Assessing Penalties**

10 17. As authorized by ORS 697.095 and OAR 441-810-0140, the Director ORDERS  
11 Man Data to pay \$307,500.00 in CIVIL PENALTIES for its 3,072 violations of ORS  
12 697.015.

13 18. The Director hereby SUSPENDS payment of \$247,500.00 of the \$307,500.00  
14 CIVIL PENALTY for a period of three years from the effective date of this Order,  
15 provided Man Data complies with the following terms:

- 16 A. Man Data complies with the terms of this Order; and  
17 B. For the three years following the effective date of this Order, Man Data shall  
18 commit no new violations of the Oregon Collection Agency Laws or of any  
19 rules adopted thereunder.

20 19. Along with Consent to Entry of Order, Man Data shall submit \$2,500.00 to  
21 the Director as the initial payment for the non-suspended portion of the civil penalties.

22 20. Payment toward the remaining \$57,500.00 of the non-suspended civil  
23 penalty shall be made to the Director in installments of not less than \$2,500.00 every 30  
24 days, beginning 30 days after the date of entry of this Order, and continuing until the  
25 entire balance of the non-suspended civil penalty amount is paid in full.

26 ///



1           21.     The suspended CIVIL PENALTY of \$247,500.00 will be waived three  
2 years from the effective date of this Order, provided Man Data has complied with the  
3 foregoing Order terms. Man Data’s failure to satisfy any term of this Order will render  
4 the suspended penalties immediately due and owing.

5           22.     This Order is a “Final Order” under ORS 183.310(6)(b). Subject to that  
6 provision, entry of this Order does not limit or prevent further remedies available to the  
7 Director under Oregon law to enforce this Order or take action for violations of this  
8 Order or of the Oregon Collection Agency Laws not covered by this Order

11           SO ORDERED this 8<sup>th</sup>     day of April                   2025

14                                   **ANDREW R. STOLFI**, Director  
15                                   Department of Consumer and Business Services

16                                   /s/ Dorothy Bean  
17                                   Dorothy Bean, Chief of Enforcement  
18                                   Division of Financial Regulation

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